



October 31, 2018

Ohio Environmental Protection Agency
Division of Air Pollution Control
Southeast District Office
2195 Front Street
Logan, Ohio 43138
Via eBusiness

Re: NSPS 0000a Initial Compliance Report
January 8, 2018 through August 2, 2018
Ohio River System - REX Booster Station

Dear Sirs:

Ohio River System, LLC is submitting this letter to meet the initial annual reporting requirement of New Source Performance Standard 40 CFR 60, Subpart 0000a (NSPS 0000a) for affected facilities owned/operated at the REX Booster Station. The REX Booster Station is located in Monroe County, Ohio. The NSPS 0000a affected facility is the "collection of fugitive emissions components at a compressor station".

As specified in 40 CFR 60.5410a, the initial compliance period for a NSPS 0000a affected facility begins on August 2, 2016, or upon initial startup (whichever is later). The initial startup of compressor P006 occurred on January 8, 2018, which establishes the beginning of the reporting period. Similarly, the initial compliance period ends 1 year after the initial startup date of the affected facility or no later than 1 year after August 2. To align this report with other NSPS 0000a reports, ORS has set the initial compliance period for the "collection of fugitive emissions components at a compressor station" affected facility at the REX Booster Station as beginning on January 8, 2018 and ending on August 2, 2018.

This initial report contained in the following sections covers the compliance period from January 8, 2018 and ending on August 2, 2018:

I. General Information (§60.5420a(b)(1))

(1) The company name and address of the affected facility.

Mailing Address: 6051 Wallace Rd Ext., Suite 300, Wexford, PA 15090
Facility Location: REX Booster Facility, 52001 Township Highway 964, Powhatan Point, Monroe County, Ohio (Latitude: 39.83583, Longitude: -80.87425)

(2) An identification of each affected facility being included in the annual report.

This report includes the following NSPS 0000a affected facilities:

Collection of fugitive emissions components at a compressor station

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(3) Beginning and ending dates of the reporting period.

This report covers the compliance period from January 8, 2018 and ending on August 2, 2018.

(4) Certification by a responsible official of truth, accuracy, and completeness

Certification statement included at closing of this letter.

II. Collection of fugitive emissions components at a compressor station (§60.5420a(b)(7))

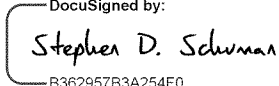
See attached table and records of LDAR monitoring.

Should you have any questions or require additional information, please contact Nick Bryan at (570) 505-3700 or Patty Centofanti of Trinity Consultants at (412) 474-3310.

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*This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.*

Sincerely,

DocuSigned by:  
  
B362957B3A254F0...  
Stephen D. Schuman  
Sr. Director - Operations

cc: US EPA Region V, Air Protection Division  
Office of Air Enforcement & Compliance  
Ralph Metcalfe Federal Building  
77 West Jackson Boulevard, Chicago, IL 60604-3511  
Via email: 'R5AirEnforcement@epa.gov'

| Facility Name       | Legal Entity       | Survey Information |                              |                         |                                    |                                                      |                                                                          |                                      |                                                            |                                                                               |                                                                          |                                                                 |                                                                            |                                                             |                                    |                                                                                                         |                                                                                                                         |  |
|---------------------|--------------------|--------------------|------------------------------|-------------------------|------------------------------------|------------------------------------------------------|--------------------------------------------------------------------------|--------------------------------------|------------------------------------------------------------|-------------------------------------------------------------------------------|--------------------------------------------------------------------------|-----------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------|------------------------------------|---------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|--|
|                     |                    | Date<br>(b)(7)(i)  | Beginning Time<br>(b)(7)(ii) | End Time<br>(b)(7)(iii) | Name of OGI Operator<br>(b)(7)(iv) | Training and Experience of OGI Operator<br>(b)(7)(v) | Ambient Temperature, Sky Conditions and Maximum Wind Speed<br>(b)(7)(vi) | Monitoring Instrument<br>(b)(7)(vii) | Deviations (or Statement of No Deviations)<br>(b)(7)(viii) | Number and Type of Components for Which Emissions Were Detected<br>(b)(7)(ix) | Number and Type of Components Not Repaired as Required<br>(b)(7)(x)      | Number and Type of DTM & UTM Components Monitored<br>(b)(7)(xi) | Date of Successful Leak Repairs<br>(b)(7)(xii)                             | Number and Type of Components Placed on DOR<br>(b)(7)(xiii) | Explanation for DOR<br>(b)(7)(xiv) | Type of Instrument Used to Resurvey a Repaired Component (not during the initial finding)<br>(b)(7)(xv) | Comments                                                                                                                |  |
| REX Booster Station | Ohio River Systems | 3/5/2018           | 9:55 AM                      | 11:15 AM                | John Ecker                         | 4.5 yrs experience FLIR OGI Certified Themographer   | 32F, Clear, Light Breeze 4-7 mph                                         | ThermaCAM GasFindIR                  | Yes - See Comments<br><br>Yes - Footnote 2 below.          | Leak #1: Ball valve handle on inlet separator<br>Leak #2: Dump valve threads  | Leaks repaired and verified within 30 days. See comments for deviations. | Not Applicable                                                  | Leaks were repaired and verified on 3/7/2018.                              | None                                                        | Not applicable                     | ThermaCAM GasFindIR                                                                                     | See Footnote 2 below regarding the OGI camera utilized. See Footnote 3 below regarding survey recordkeeping deviations. |  |
| REX Booster Station | Ohio River Systems | 5/24/2018          | 10:00 AM                     | 11:15 AM                | John Ecker                         | 4.5 yrs experience FLIR OGI Certified Themographer   | 68F, Sunny, Light Air 1-3 mph                                            | ThermaCAM GasFindIR                  | Yes - See Comments<br><br>Yes - Footnote 2 below.          | Leak #1: Threads on sight glass, inlet separator                              | Leaks repaired and verified within 30 days. See comments for deviations. | Not Applicable                                                  | Leaks were repaired and verified on 5/24/2018 during the monitoring event. | None                                                        | Not applicable                     | ThermaCAM GasFindIR                                                                                     | See Footnote 2 below regarding the OGI camera utilized. See Footnote 3 below regarding survey recordkeeping deviations. |  |
|                     |                    |                    |                              |                         |                                    |                                                      |                                                                          |                                      |                                                            |                                                                               |                                                                          |                                                                 |                                                                            |                                                             |                                    |                                                                                                         |                                                                                                                         |  |

1. No components at any facility are currently designated as DTM or UTM.

2. The OGI equipment utilized for the two surveys conducted in the reporting period were conducted using an OGI camera that was not listed in the Monitoring Plan. The OGI equipment used was a FLIR ThermaCAM GasFindIR. This model camera pre-dated NSPS 0000a, and as such FLIR has not retroactively provided third party verification to the standard for this model. However, from discussions with FLIR, the ThermaCAM GasFindIR uses the same lenses and technology as the newer '0000a verified' cameras which result in the GasFindIR camera being:

- capable of imaging gases in the spectral range for the compound of highest concentration in the potential fugitive emissions and
- capable of imaging a gas that is half methane, half propane at a concentration of 10,000 ppm at a flow rate of ≤60 g/hr from a quarter inch diameter orifice.

As a corrective action, ORS has made arrangements for future surveys to be conducted with a verified camera. [40 CFR 60.5397a(e)(7), Condition C.2.c).(2), and Condition C.2.d).(5)]

3. The following required recordkeeping elements were not recorded/maintained:

- a. Repair verification video not maintained on file. Per footnote 2, the OGI camera utilized does not have video recording capabilities. Leaks were documented, repaired, and verified timely.
- b. Overall survey picture not taken with date and lat/lon.
- c. Daily verification check includes a camera calibration prior to each monitoring survey; however, the calibration is not documented.
- d. Measured maximum viewing distance was not measured/documented; however, components at this site are viewed from a distance of 2 to 10 feet which is within the recommended viewing distance.

## ATTACHMENT - LDAR SURVEY RECORDS

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**ENERGY TRANSFER****Ohio River System LLC - FLIR LEAK DETECTION AND REPAIR PLAN****LDAR - Quarterly FLIR Inspection Log - 2018**

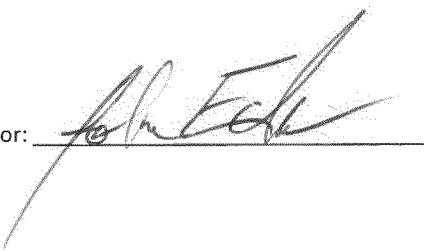
Start Time 9:55 a.m.

Station Name: Rex

End Time 11:15 a.m.

| Date | Time | Conditions | Individual<br>Conducting the<br>Inspection | Results of the<br>Inspection(Yes<br>or No) If Yes,<br>Complete<br>Repair Record | Briefly Identify Leaking Component | Comments |
|------|------|------------|--------------------------------------------|---------------------------------------------------------------------------------|------------------------------------|----------|
|------|------|------------|--------------------------------------------|---------------------------------------------------------------------------------|------------------------------------|----------|

|          |            |                                  |            |     |                                      |                     |
|----------|------------|----------------------------------|------------|-----|--------------------------------------|---------------------|
| 3/5/2018 | 10:05 a.m. | Clear, Light Breeze 4-7mph, 32°F | John Ecker | Yes | Ball Valve handle on inlet separator | Aaron Hines Present |
| 3/5/2018 | 10:15 a.m. | Clear, Light Breeze 4-7mph, 32°F | John Ecker | Yes | Dump valve threads                   | Aaron Hines Present |

Signature of Inspector: Date: 3/22/18

Maintain records for a period of five (5) years.



ENERGY TRANSFER

Ohio River System LLC - FLIR LEAK DETECTION AND REPAIR PLAN

LDAR - Quarterly FLIR Inspection Log - 2018

Station Name: Rex

Start Time 9:55 a.m.  
End Time 11:15 a.m.

| Date of Leak Reported | Dates of Each Attempted Repair (Within 15 days) | Individual Attempting Repair | Repair Method Used   | Leak Fixed? (Yes or No, If No, Complete Delay of Repair Record) |
|-----------------------|-------------------------------------------------|------------------------------|----------------------|-----------------------------------------------------------------|
| 3/5/2018              | 3/7/2018                                        | Aaron Hines                  | Replaced             | Yes                                                             |
| 3/5/2018              | 3/7/2018                                        | Aaron Hines                  | Retape and pipe dope | Yes                                                             |

Maintain records for a period of five (5) years.

**ENERGY TRANSFER****Ohio River System - FLIR LEAK DETECTION AND REPAIR PLAN****LDAR - Quarterly FLIR Inspection Log - 2018**

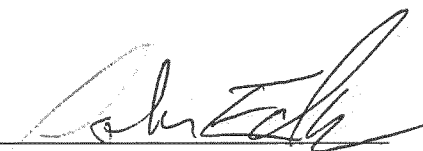
Start Time 10:00 a.m.

Station Name: Rex

End Time 11:15 a.m.

| Date | Time | Conditions | Individual<br>Conducting<br>the Inspection | Results of the<br>Inspection(Yes<br>or No) If Yes,<br>Complete<br>Repair Record | Briefly Identify Leaking Component | Comments |
|------|------|------------|--------------------------------------------|---------------------------------------------------------------------------------|------------------------------------|----------|
|------|------|------------|--------------------------------------------|---------------------------------------------------------------------------------|------------------------------------|----------|

|           |            |                                |            |     |                                        |                                        |
|-----------|------------|--------------------------------|------------|-----|----------------------------------------|----------------------------------------|
| 5/24/2018 | 10:15 a.m. | Sunny, 68°F, Light Air 1-3 mph | John Ecker | Yes | Threads on site glass, inlet separator | Operator on site immediately corrected |
|-----------|------------|--------------------------------|------------|-----|----------------------------------------|----------------------------------------|

Signature of Inspector: Date: 5/24/18

Maintain records for a period of five (5) years.